

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO**

In re POLYURETHANE FOAM ANTITRUST LITIGATION	)	
	)	MDL Docket No. 2196
	)	Index No. 10-MD-2196 (JZ)
This document relates to:		)
		)
ALL CASES	)	
	)	

**""""""STIPULATION AND ORDER TO EXTEND TIME  
TO SUBMIT BRIEFS ON DOWNSTREAM DISCOVERY ORDER  
AND TO MEET AND CONFER OVER GLOSSARY OF TERMS**

WHEREAS simultaneous briefs addressing the Court's September 7, 2012 downstream discovery order are presently due to be submitted to the Court on November 15, 2012;

WHEREAS Direct Purchaser and Direct Action Plaintiffs request a extension of time until November 19, 2012 for the parties to submit the briefs, because of the disruption of work caused by Hurricane Sandy, and due to short-term family health issues of one of the attorneys involved in the briefing;

WHEREAS Defendants do not oppose that request;

WHEREAS an agreed-upon glossary of terms, if the parties can reach an agreement, is presently due to be submitted to the Court on November 15, 2012;

WHEREAS the undersigned parties request an extension of time until December 6, 2012 for the parties to meet and confer over a glossary of terms and to submit an agreed-upon glossary of terms, if the parties can reach an agreement;

IT IS THEREFORE STIPULATED AND AGREED by the undersigned parties and ORDERED by the Court that:

1. The time for the parties to submit simultaneous briefs regarding the Court's September 7, 2012 downstream discovery order is extended to November 19, 2012; and
2. The time for the parties to meet and confer over a glossary of terms and to submit an agreed-upon glossary of terms, if the parties can reach an agreement, is extended to December 6, 2012.

DATED: 11/16/2012

SO ORDERED:

s/Jack Zouhary  
Honorable Jack Zouhary  
United States District Judge

DATED: November 15, 2012

Respectfully submitted,

/s/ William A. Isaacson  
William A. Isaacson  
BOIES, SCHILLER & FLEXNER LLP  
5301 Wisconsin Avenue, NW  
Washington, DC 20015  
Phone: 202-237-5607  
Fax: 202-237-6131

/s/ Stephen R. Neuwirth  
Stephen R. Neuwirth  
QUINN EMANUEL URQUHART  
& SULLIVAN, LLP  
51 Madison Avenue, 22nd Floor  
New York, NY 10010  
Phone: 212-849-7165  
Fax: 212-849-7100

*Direct Purchaser (Class) Plaintiffs' Interim Co-Lead Counsel*

/s/ William J. Blechman  
William J. Blechman  
**KENNY NACHWALTER, P.A.**  
201 South Biscayne Boulevard  
Suite 1100  
Miami, Florida 33131-4327  
Phone: 305-373-1000  
Fax: 305-372-1861

*Liaison Counsel for Direct Action Plaintiffs and Counsel for Sealy Corporation, Select Comfort Corporation, Simmons Bedding Company, Tempur-Pedic International, Inc., and La-Z-Boy Incorporated*

/s/ James H. Walsh  
James H. Walsh  
MCGUIREWOODS LLP  
One James Center  
901 E. Cary St.  
Richmond, VA 23219  
Phone: (804) 775-1000  
Fax: (804) 775-1061

*Counsel for Carpenter Co.*

/s/ Francis P. Newell  
Francis P. Newell  
COZEN O'CONNOR  
1900 Market Street  
Philadelphia, PA 19103  
Phone: (215) 665-2000  
Fax: (215) 665-2013

*Counsel for FXI – Foamex Innovation, Inc.*

/s/ Kendall Millard  
Kendall Millard  
BARNES & THORNBURG LLP  
11 South Meridian Street  
Indianapolis, IN 46204-3535  
Phone: (317) 231-7461  
Fax: (317) 231-7433

*Counsel for Flexible Foam Products, Inc.*

/s/ Frank A. Hirsch, Jr.  
Frank A. Hirsch, Jr.  
ALSTON & BIRD LLP  
3201 Beechleaf Court, Suite 600  
Raleigh, NC 27604-1500  
Phone: (919) 862-2200  
Fax: (919) 862-2260

*Counsel for Hickory Springs Manufacturing Co.*

/s/ Edward G. Warin  
Edward G. Warin  
KUTAK ROCK LLP  
The Omaha Building  
1650 Farnam Street  
Omaha, NE 68102-2186  
Phone: (402) 346-6000  
Fax: (402) 346-1148

/s/ Daniel R. Warncke  
Daniel R. Warncke  
TAFT STETTINIUS & HOLLISTER LLP  
425 Walnut Street, Suite 1800  
Cincinnati, OH 45202-3957  
Phone: (513) 381-2838  
Fax: (513) 381-0205

Joe Rebein  
SHOOK, HARDY & BACON LLP  
2555 Grand Blvd.  
Kansas City, MO 64108  
Phone: (816) 559-2227

***Counsel for Future Foam, Inc.***

/s/ Daniel G. Swanson  
Daniel G. Swanson  
GIBSON, DUNN & CRUTCHER LLP  
333 South Grand Avenue  
Los Angeles, CA 90071  
Phone: (213) 229-6690  
Fax: (213) 229-6919

Cynthia Richman  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Avenue, N.W.  
Washington, DC 20036-5306  
Phone: (202) 530-8500  
Fax: (202) 530-9651

***Counsel for Woodbridge Foam Corporation,  
Woodbridge Sales & Engineering, Inc., and  
Woodbridge Foam Fabricating, Inc.***

***Counsel for Leggett & Platt, Incorporated***

/s/ Randall L. Allen  
Randall L. Allen  
ALSTON & BIRD LLP  
One Atlantic Center  
1201 W. Peachtree St.  
Atlanta, GA 30309  
Phone: (404) 881-7000  
Fax: (404) 881-7777

***Counsel for Mohawk Industries, Inc.***